

MORRIS PETERSON  
Robert McCoy, Bar No. 9121  
Email: rrm@morrislawgroup.com  
Rex D. Garner, Bar No. 9401  
Email: rdg@morrislawgroup.com  
900 Bank of America Plaza  
300 South Fourth Street  
Las Vegas, Nevada 89101  
Telephone: (702) 474-9400  
Facsimile: (702) 474-9422

WELLS MARBLE & HURST, PLLC.  
Kenna L. Mansfield, (*pro hac vice pending*)  
Joshua P. Henry, (*pro hac vice pending*)  
300 Concourse Boulevard, Suite 200  
Ridgeland, MS 39157  
Telephone: (601) 605-6900  
Facsimile: (601) 605-6901

Attorneys for Defendant Pacific  
Life Insurance Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRIAN C. TANKO, Ltd; BRIAN  
TANKO, and VICTORIA TANKO,

Plaintiffs,

v.

PACIFIC LIFE INSURANCE  
COMPANY; CBZ RETIREMENT  
SOLUTIONS, LLC; CORY ZIMET;  
ECONOMIC CONCEPTS, INC.; ECI  
PENSION SERVICES, LLC;  
MEDALIST PENSION ADVISORS,  
LLC; PENSION STRATEGIES, IBP,  
LLC, and KENNETH R. HARSTEIN,

Defendants

CASE NO: 2:11-cv-02073-GMN-GWF

**DEFENDANTS' JOINT  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT  
(SECOND REQUEST)**

Defendants move the Court for an extension of time to respond to  
Plaintiffs' complaint up to and including February 15, 2012 pursuant to LR 6-1.  
This is the second extension requested concerning this matter. Plaintiffs' counsel  
has informed Pacific Life's counsel that there is no opposition to this request and  
that it would extend to the other served defendants to this cause.

1 On November 14, 2011, Plaintiffs commenced this action by filing a  
2 complaint in the Eighth Judicial District Court, Clark County, Nevada. On  
3 December 22, 2011, Pacific Life removed this action to federal court and all other  
4 defendants consented to the removal.

5 This request for an extension is made in good faith and not made for  
6 the purpose of undue delay. Therefore, the Defendants respectfully requests that  
7 the Court grant this motion.

8 Respectfully submitted:

9  
10 MORRIS PETERSON

LOVAAS & LEHTINEN, P.C.

11 By: /s/ Rex D. Garner  
12 Robert McCoy, Bar No. 9121  
13 Rex D. Garner, Bar No. 9401  
14 300 South Fourth Street, Ste. 900  
15 Las Vegas, Nevada 89101

By: /s/ Aaron D. Lovaas  
Aaron D. Lovaas, Bar No. 5701  
6128 West Sahara Avenue  
Las Vegas, Nevada 89146

14 Attorneys for Defendant Pacific Life  
Insurance Company

Attorney for Pension Strategies, IBP,  
LLC

15  
16 WILSON ELSER


17 By: /s/ David Kahn  
18 David Kahn, Bar No. 7038  
19 300 South Fourth Street, 11th Floor  
20 Las Vegas, Nevada 89101

21 Attorney for Defendants Economic  
22 Concepts, Inc.; ECI Pension Services,  
23 LLC; Medalist Pension Advisors, LLC  
24 and Kenneth R. Harstein

## ORDER

25 It is so ordered. All served Defendants shall have up to and including  
26 February 15, 2012 to answer or otherwise respond to the Complaint.

27 Dated: January 20, 2012.

28  
  
GEORGE FOLEY, JR.  
United States Magistrate Judge

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of MORRIS PETERSON, that I am familiar with the firm's practice of collection and processing documents for mailing; that, in accordance therewith, I caused the following document to be deposited with the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first class postage prepaid, on the date and to the addressee(s) shown below: **DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

TO:

P. Sterling Kerr  
Law Offices of P. Sterling Kerr  
2450 St. Rose Parkway, Ste. 120  
Henderson, Nevada 89074  
Email: psklaw@aol.com

Marc S. Cwik  
Lewis Brisbois Bisgaard & Smith LLP  
6385 S. Rainbow Blvd., Ste. 600  
Las Vegas, Nevada 89118  
Email: cwik@lbbsslaw.com

*Attorney for Plaintiffs*

*Attorneys for Defendants CBZ Retirement Solutions, LLC and Cory Zimet*

David Kahn  
Wilson Elser  
300 South Fourth Street, 11th Floor  
Las Vegas, Nevada 89101

Aaron D. Lovaas  
Lovaas & Lehtinen  
6128 West Sahara Avenue  
Las Vegas, Nevada 89146

Robert J. D'Anniballe, Jr.  
Pietragallo Gordon Alfano Bosick & Raspanti, LLP  
200 Stanton Blvd., Suite 100  
Steubenville, Ohio 43952

James F. Polese  
Gammage & Burnham, PLC  
Two North Central, 15th Floor  
Phoenix, Arizona 85004

*Attorneys for Defendants Economic Concepts, Inc.; ECI Pension Services, LLC; Medalist Pension Advisors, LLC and Kenneth R. Harstein*

*Attorneys for Defendant Pension Strategies, IBP, LLC*

Dated this 17<sup>th</sup> day of January, 2012.

By: [Signature]